

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**JESSICA JONES, MICHELLE VELOTTA,
and CHRISTINA LORENZEN on Behalf of
Themselves and All Others Similarly Situated,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC; VARSITY
SPIRIT, LLC; VARSITY SPIRIT FASHION
& SUPPLIES, LLC; U.S. ALL STAR
FEDERATION, INC.; JEFF WEBB;
CHARLESBANK CAPITAL PARTNERS
LLC; and BAIN CAPITAL PRIVATE
EQUITY,**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**DECLARATION ELISSA BUCHANAN IN SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION TO DISCOVERY RESPONSES FROM VARSITY
DEFENDANTS**

I, Kevin Rayhill, declare and state as follows:

I am an attorney at the Joseph Saveri Law Firm, LLP. ("JSLF"), counsel for Plaintiffs Jessica Jones, Michelle Velotta, and Christina Lorenzen (collectively, "Plaintiffs "), in *Jones v. Bain Capital Private Equity*, case no. 2:20-cv-02892-SHL-cgc (the "Jones" action). I am a member in good standing of the State Bar of California and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them.

1. Attached hereto as Exhibit 1 is a true and correct copy of an email exchange between Plaintiffs' counsel Kate Malone and Varsity counsel Steven Kaiser on November 16 & 17, 2021.

2. Attached hereto as Exhibit 2 is a true and correct copy of a letter I sent to Mr. Kaiser on March 14, 2022.

3. Attached hereto as Exhibit 3 is a true and correct copy of an email I sent to Mr. Kaiser on March 14, 2022.

4. Attached hereto as Exhibit 4 is a true and correct copy of an email I sent to Mr. Kaiser on March 15, 2022.

5. On March 15, 2022, I met and conferred by telephone with Steven Kaiser. Other counsel for Varsity were also on the call but did not participate.

6. Attached hereto as Exhibit 5 is a true and correct copy of an email exchange between myself and Mr. Kaiser on March 16, 2022.

7. Attached hereto as Exhibit 6 is a true and correct copy of a letter I sent to Mr. Kaiser on March 17, 2022.

8. Attached hereto as Exhibit 7 is a true and correct copy of a letter from Mr. Kaiser to me sent on March 18, 2022.

9. Attached hereto as Exhibit 8 is a true and correct copy of an email exchange between myself and Mr. Kaiser on March 1, 2022.

I declare under penalty of perjury that the foregoing is true and correct, and this Declaration is executed at San Francisco, California on March 18, 2022.

By: /s/ Kevin E. Rayhill
Kevin E. Rayhill

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2022, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri
Joseph R. Saveri